

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

IN RE:
CUMMINGS MANOOKIAN, PLLC
Debtor.
JEANNE ANN BURTON, TRUSTEE
Plaintiff,
v.
**HAGH LAW, PLLC; AFSOON HAGH;
and MANOOKIAN PLLC,**
Defendants.

**Case No, 3:19-bk-07235
Chapter 7
Judge Walker**
Adv. Proc. No. 3:20-ap-90002

**MANOOKIAN PLLC'S RESPONSE TO PLAINTIFF'S MOTION TO COMPEL
DISCOVERY RESPONSES FROM MANOOKIAN PLLC**

Defendants, through counsel, oppose the relief requested in Plaintiff's Motion to Compel Discovery Responses from Manookian PLLC.

I. Introduction and Background

Plaintiff seeks to compel discovery responses from Manookian PLLC as to "the percentage or dollar amount to which Manookian PLLC alleges it is entitled with regard to fees generated by the *Fitzgerald* or *Shoemaker* matters." But Manookian PLLC has already responded repeatedly to this request: Manookian PLLC **is the Defendant in this matter**. The Plaintiff is the entity alleging that it is entitled to fees.

II. Argument

As a threshold matter, this Court should deny the Plaintiff's discovery motion because it does not comply with Local Rule 37.01. It does not include a joint statement from the parties, and, more critically, it does not include the answer from Manookian PLLC that the Plaintiff alleges is deficient. For that reason alone – and consistent with this Court's practice of strictly construing procedural and local rules against the Defendants – the Plaintiff's Motion must be denied.

The motion must also be denied on substantive grounds. The Plaintiff is seeking to require Manookian PLLC to allege an amount or percentage it is entitled to in fees in the *Fitzgerald* or *Shoemaker* matter. But Manookian PLLC is the Defendant. It has been sued by the Plaintiff. Manookian PLLC is not seeking any relief. The Plaintiff is the party alleging it is entitled to fees from Manookian PLLC, not the other way around.

Manookian PLLC has already, and repeatedly, answered this question with respect to the Plaintiff: Manookian PLLC does not, and has never, alleged that Cummings Manookian PLLC owes them any amount of money as a fee in these cases. Nor is Manookian PLLC, as the Defendant, required to allege such a thing. Plaintiff's Motion to compel Manookian PLLC to further detail an allegation it has never made is nonsensical.

III. Conclusion

For all the foregoing reasons, including Plaintiff's failure to comply with the mandates of the local rules, the Plaintiff's Motion should be denied.

Date: July 7, 2025

Respectfully submitted,

/s/ John Spragens

John Spragens (TN Bar No. 31445)
Spragens Law PLC
915 Rep. John Lewis Way S., Suite 100
Nashville, TN 37203
T: (615) 983-8900
F: (615) 682-8533
john@spragenslaw.com

Attorney for Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was filed July 7, 2025 and served electronically upon all parties as indicated on the receipt issued by the Court's electronic filing system:

Phillip G. Young, Jr.
Thompson Burton PLLC
One Franklin Park
6100 Tower Circle, Suite 200
Franklin, TN 37067
Tel: 615.465.6008
Fax: 615.807.3048
Email: phillip@thompsonburton.com

Craig V. Gabbert, Jr.
Bass, Berry & Sims PLC
21 Platform Way, Suite 3500
Nashville, TN 37203

/s/ John Spragens